

1 Rashā Gerges Shields (Cal. Bar No. 218248)
rgergesshields@jonesday.com
2 Tyler J. Scott (Cal. Bar No. 341039)
tscott@jonesday.com
3 JONES DAY
4 555 South Flower Street, 50th Floor
Los Angeles, CA 90071
5 Telephone: +1.213.243.2719
Facsimile: +1.213.243.2539

7 Attorneys for Defendant
UNIVERSITY OF SOUTHERN CALIFORNIA

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

12 DOE JEWISH USC FACULTY
13 MEMBER 2004 and DOE JEWISH
14 USC STUDENT 1987, Individually
And On Behalf of All Others Similarly
Situated,

13 Plaintiffs,

17 | V.

18 Trustees of THE UNIVERSITY OF
19 SOUTHERN CALIFORNIA, a private
public benefit corporation; and DOES 1
through 100, inclusive,

2.1 Defendants.

Case No. 2:24-cv-05712 FLA (SSC)

**DEFENDANT'S REQUEST FOR
JUDICIAL NOTICE IN SUPPORT
OF ITS RESPONSE TO THE
COURT'S ORDER TO SHOW
CAUSE WHY ACTION SHOULD
NOT BE REMANDED**

**(AMOUNT IN CONTROVERSY
UNDER CAFA)**

REQUEST FOR JUDICIAL NOTICE

Pursuant to Federal Rule of Evidence 201, Defendant University of Southern California (“USC” or “the University”) hereby requests that this Court take judicial notice of the following facts in connection with its Response to the Court’s Order to Show Cause Why Action Should Not be Remanded for Lack of Subject Matter Jurisdiction, which is being filed contemporaneously with this request:

- The 2023-2024 tuition at USC for a full-time undergraduate taking 12-18 units each semester is \$66,640. The 2023-2024 student fees at USC for a full-time undergraduate taking 12-18 units each semester is \$1,597. Together, the tuition and fees at USC for a full-time undergraduate taking 12-18 units each semester is \$68,237. Sources: University of California, *Cost of Attendance*, available at <https://financialaid.usc.edu/undergraduate-financial-aid/cost-of-attendance/> (attached as Ex. A); United States Department of Education, National Center for Education Statistics, *University of Southern California* (Tab 2: “Tuition, Fees, and Estimated Student Expenses”), available at <https://nces.ed.gov-collegenavigator/?q=University+of+Southern+California&s=all&id=123961#expenses> (attached as Ex. B).
 - In 2023, the Tides Foundation donated \$250,000 to USC in Support of the University’s educational programs. Source: IRS Form 990 for the Tides Foundation at 393, available at https://www.tides.org/wp-content/uploads/2024/02/2022_Tides-Foundation_Amended-Form-990-Public-Disclosure.pdf (relevant excerpt attached as Ex. C).
 - From 2016 through 2022, the Open Society Foundations awarded a total of \$1,880,765 in grant funding to USC. Funds were awarded in 2016, 2017, 2020, 2021, and 2022. Source: Open Society

1 Foundations, *Awarded Grants: University of Southern California*,
2 available at [https://www.opensocietyfoundations.org/grants/
3 past?filter_keyword=University+of+Southern+California](https://www.opensocietyfoundations.org/grants/past?filter_keyword=University+of+Southern+California) (attached
4 as Ex. D).

- 5 • The Open Society Foundations were founded by George Soros.
6 Source: Open Society Foundations, *Who We Are*, available at
7 <https://www.opensocietyfoundations.org/who-we-are> (attached as
8 Ex. E).
- 9 • The Rockefeller Foundation awarded a \$700,000 grant to the
10 University for a project spanning September 1, 2020 to January 1,
11 2023. Source: The Rockefeller Foundation, *Our Grants:*
12 *University of Southern California*, available at:
13 <https://www.rockefellerfoundation.org/grant/grant-2020-388/>
14 (attached as Ex. F).
- 15 • Hillel International describes USC Hillel as “the Center of Jewish
16 Life at USC, engaging over 1,500 unique students annually.” Hillel
17 estimates that there are 2,000 Jewish undergraduate students and
18 2,000 Jewish graduate students enrolled at USC, for a total of 4,000.
19 Source: Hillel International, University of Southern California,
20 available at [https://www.hillel.org/college/university-of-southern-
21 california/](https://www.hillel.org/college/university-of-southern-california/) (attached as Ex. G).

22 For the reasons set forth herein, the Court can and should take judicial notice
23 of the above publicly-available facts and exhibits.

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 Facts “generally known within the trial court’s territorial jurisdiction” or
3 “readily determined from sources whose accuracy cannot be reasonably questioned”
4 are subject to judicial notice. Fed. R. Evid. 201(b). When either standard is met, a
5 party requests notice, and the court is provided with the relevant information, Rule
6 201(c)(2) provides that notice shall be taken. Alternatively, a court may take judicial
7 notice of facts on its own. Fed. R. Evid. 201(c)(1). Pursuant to Rule 201(b) and (c),
8 USC respectfully requests that the Court take notice of the above facts and attached
9 exhibits.

10 USC’s tuition and fees are judicially noticeable under Rule 201(b)(2). *See, e.g.,*
11 *In re Hautman*, No. 10-11285-RGM, 2011 WL 805761, at *1 (Bankr. E.D. Va. 2011)
12 (taking judicial notice of tuition increases at Maryland state college); *Porretto v. Pan*
13 *Ocean Bulk Carriers, Ltd.*, No. CIV.A. 86-2160, 1987 WL 18615, at *5 n.5 (E.D. La.
14 1987) (taking judicial notice of tuition at the University of New Orleans); *see also*
15 *Vega v. Sacred Heart Univ.*, No. 3:10CV1870, 2013 WL 2420329, at *2 n.2 (D. Conn.
16 2013) (taking judicial notice of tuition and fee refund policies). Tuition and fees are
17 set by the University, and its public posting of these figures is a “source[] whose
18 accuracy cannot reasonably be questioned.” Fed. R. Evid. 201(b)(2). Moreover,
19 courts frequently “take judicial notice of . . . matters of public record,” like public
20 government documents. *E.g., Reyn’s Pasta Bella, LLC v. Visa USA, Inc.*, 442 F.3d
21 741, 746, n.6 (9th Cir. 2006). As noted above, the Department of Education records
22 and publishes the tuition and fees at U.S. colleges, including USC.

23 Charitable giving is likewise judicially noticeable under Rule 201(b)(2). *See*
24 *Beth Israel Med. Ctr. v. Smith*, 576 F. Supp. 1061, 1069 (S.D.N.Y. 1983) (taking
25 judicial notice of a charity’s funding sources and general activities and explaining that
26 requiring added allegations or evidence “would be a sterile exercise”); *see also*
27 *Przewozman v. Charity*, No. 20CV6088NGGTAM, 2023 WL 2562537, at *2 n.2
28 (E.D.N.Y. 2023) (taking notice of information on Qatar Charity’s website); *Velez-*

1 *Acevedo v. Centro de Cancer de la Universidad de Puerto Rico*, No. CV 19-1560
2 (SCC), 2021 WL 2785496, at *8 n.16 (D.P.R. 2021) (taking judicial notice of the
3 financial statements of the University of Puerto Rico’s Comprehensive Cancer
4 Center); *cf. Kern v. Comm’r*, 55 T.C.M. (CCH) 667 (T.C. 1988) (taking judicial notice
5 “of the practice of benevolent charities accepting whatever value a donor places on
6 his donation”). Charities like the Open Society Foundations and the Rockefeller
7 Foundation are established institutions that publicly post their grant awards on their
8 websites. *See Patel v. Parnes*, 253 F.R.D. 531, 547 (C.D. Cal. 2008) (accepting
9 defendant’s claim “that courts in the Ninth Circuit routinely grant judicial notice of
10 press releases” and collecting cases). As a public announcement by the charity itself,
11 the grant awards section of a charity website is a “source[] whose accuracy cannot
12 reasonably be questioned” for the fact of a grant award. Fed. R. Evid. 201(b)(2).
13 Similarly, tax documents in the public record may be properly subject to judicial
14 notice. *See United States v. Paulson*, 204 F. Supp. 3d 1102, 1108–09 & n.2 (S.D. Cal.
15 2016), *rev’d and remanded on other grounds*, 68 F.4th 528 (9th Cir. 2023). While
16 IRS Form 990 is an important IRS reporting tool, “[o]rganizations also use the Form
17 990 to share information with the public about their programs.” IRS Form 990, Form
18 Resources and Tools, available at <https://www.irs.gov/charities-non-profits/form-990-resources-and-tools>. The fact of a donation reported on IRS Form 990—like for
19 the Tides Foundation here—cannot reasonably be questioned. *See* Fed. R. Evid.
20 201(b)(2).

22 Third, courts may take judicial notice of “the existence and contents” of
23 websites under Rule 201(b)(2). *In re Meta Pixel Tax Filing Cases*, No. 22-CV-07557-
24 PCP, 2024 WL 1251350, at *3 (N.D. Cal. 2024); *see also, e.g.*, *Wilson v. Playtika,*
25 *Ltd.*, 349 F. Supp. 3d 1028, 1042 (W.D. Wash. 2018) (court may take judicial notice
26 of information derived from a publicly accessible website). This includes the fact that
27 Hillel International describes USC Hillel as “the Center of Jewish Life at USC,”
28 which engages “over 1,500 unique students annually,” and estimates that there are

1 4,000 Jewish students on campus. Ex. G. To be sure, the precise and true number of
2 Jewish students—and in particular whether that putative class is readily ascertainable
3 under Rule 23—will be contested. But at this stage of the case, it is USC’s burden
4 only to show a *possible* size of the putative class in calculating its “*possible* liability.”
5 *Jauregui v. Roadrunner Trans. Servs., Inc.*, 28 F.4th 989, 994 (9th Cir. 2022)
6 (quotation marks omitted).¹ Accordingly, the Court may take into account the
7 contents of Hillel’s website as a relevant claim concerning the possible size of the
8 class.

9 All of the discussed facts are judicially noticeable. To the extent that the Court
10 declines to grant any of the aforementioned requests, the Court should still take into
11 account the attached documents in its analysis. To counter a factual attack with
12 summary-judgment like evidence, *see Leite v. Crane Co.*, 749 F.3d 1117, 1121 (9th
13 Cir. 2014), USC must only point to evidence that is *capable* of being considered or
14 introduced in an admissible form in the future, *see Fraser v. Goodale*, 342 F.3d 1032,
15 1036 (9th Cir. 2003) (“At the summary judgment stage, we do not focus on the
16 admissibility of the evidence’s form. We instead focus on the admissibility of its
17 contents.”). Accordingly, USC could use live testimony to establish—for instance—the
18 tuition it sets and the grant funding it receives. Congress did not contemplate
19 extensive “discovery related to the amount in controversy . . . in enacting CAFA.”
20 *Abrego Abrego v. The Dow Chem. Co.*, 443 F.3d 676, 679 (9th Cir. 2006) (internal
21 quotations omitted); *see also Ibarra v. Manheim Investments, Inc.*, 775 F.3d 1193,
22 1197 (9th Cir. 2015) (“Congress designed the terms of CAFA specifically to permit a
23 defendant to remove certain class or mass actions into federal court . . . [and] intended
24 CAFA to be interpreted expansively.”). At this stage, these documents are more than
25

26 ¹ USC has already shown that the class contains at least 100 members as
27 required by the Class Action Fairness Act (CAFA) because over 100 students that
28 were enrolled at USC in Spring 2024 self-reported their religious affiliation as Jewish
to the University. *See* Dkt. 1-Ex. B (Chang Declaration) ¶¶ 3-4.

1 sufficient to meet USC's burden, even standing alone.

2 **CONCLUSION**

3 For the foregoing reasons, USC respectfully requests that, in connection with
4 its response to the Court's Order to Show Cause, the Court take judicial notice of the
5 above facts and attached exhibits.

6 Dated: July 26, 2024

7 Respectfully submitted,

8 JONES DAY

10 By: /s/ Rasha Gerges Shields
11 Rasha Gerges Shields

12 Attorneys for Defendant
13 UNIVERSITY OF SOUTHERN
14 CALIFORNIA

CERTIFICATE OF COMPLIANCE

2 The undersigned, counsel of record for Defendant University of Southern
3 California, certifies that this brief contains 1,103 words, which complies with the
4 word limit of L.R. 11-6.1 and Standing Order 6(c).

5 | Dated: July 26, 2024

Respectfully submitted,

JONES DAY

By: /s/ Rasha Gerges Shields
Rasha Gerges Shields

Attorneys for Defendant
UNIVERSITY OF SOUTHERN
CALIFORNIA

CERTIFICATE OF AUTHENTICITY

16 The undersigned, counsel of record for Defendant University of Southern
17 California, certifies that the attached Exhibits A-G are true and correct PDF copies of
18 the web sources listed above as they appeared on July 25, 2024.

20 | Dated: July 26, 2024

Respectfully submitted,

JONES DAY

By: /s/ Rasha Gerges Shields
Rasha Gerges Shields

Attorneys for Defendant
UNIVERSITY OF SOUTHERN
CALIFORNIA

EXHIBIT A



Cost of Attendance

[Jump to a Section](#)

Overview

We understand that a college education involves a significant investment of resources for both students and families. The last thing we want, however, is for cost to prevent a student from enrolling at USC.

Paying for an education represents a partnership between the university and students and their families. While we expect each student's family to play a leading role in financing a college education, we have a long tradition of helping bridge the gap between the cost of attendance and what families can afford to pay out of pocket.

Please note: To receive the full amount of aid you may qualify for, you must meet the eligibility requirements and submit your aid application(s) by the appropriate deadlines.

2024-2025 Estimate of Cost of Attendance

The USC estimated Cost of Attendance is based on average amounts for necessary expenses and is used to determine your financial aid eligibility. It includes tuition, fees, books, supplies, housing, meals and other living expenses for two semesters of study.

Keep in mind that your actual costs may differ, based on your major of study and individual circumstances. Estimated budgets for some majors may be higher because of special laboratory or studio supply fees, or other additional costs incurred by all students in the program.

Tuition is the same for both in-state and out-of-state residents.

	<u>On/Off Campus</u>	<u>With Parents or Relatives</u>
Tuition (12-18 units for two semesters)	\$69,904	\$69,904
Fees	\$1,743	\$1,743
Housing*	\$12,271	\$2,674
Food/meal plan*	\$7,660	\$3,750
Books and supplies	\$1,200	\$1,200
Personal and miscellaneous	\$2,006	\$2,006
Transportation	\$441	\$1,914
Total**	\$95,225	\$83,191

*Includes average rent and the standard meal plan for students living in on-campus freshman housing.

**Add \$450 New Student Fee for your first semester.



Financial Aid

Undergraduate Financial Aid

2023-2024 Estimate of Cost of Attendance

The following are the estimated two-semester costs for a full-time USC undergraduate taking 12-18 units each semester and living in university housing:

	<u>On/Off Campus</u>	<u>With Parents or Relatives</u>
Tuition (12-18 units for two semesters)	\$66,640	\$66,640
Fees	\$1,597	\$1,597
Housing*	\$11,910	\$2,594
Dining/meals*	\$7,290	\$3,636
Books and supplies	\$1,200	\$1,200
Personal and miscellaneous	\$1,820	\$1,820
Transportation	\$464	\$1,868
Total**	\$90,921	\$79,355

*Includes average rent and the standard meal plan for students living in on-campus freshman housing.

**Add \$450 New Student Fee for your first semester.

[University Park Campus \(Map\)](#)

213-740-2311

[Tommy Cam](#)

[Hecuba Cam](#)



[Undergraduate Financial Aid](#)

[Financial Aid at USC](#)

[Applying for Financial Aid](#)

[Prospective Students: Dates & Deadlines](#)

[Admitted and Continuing Students: Dates & Deadlines](#)

[Financial Aid Calculators](#)

[Financial Aid Summary and Tasks](#)

[Graduate & Professional Financial Aid](#)

[Applying for Financial Aid](#)

[Prospective Students: Dates & Deadlines](#)

[Admitted and Continuing Students: Dates & Deadlines](#)

[Financial Aid Summary and Tasks](#)

[Honoring Native Lands](#)

[Our Commitment to Affordability](#)

[Privacy Notice](#)

Financial Aid

Undergraduate Financial Aid

Annual Security & Fire Safety Prospective Student Notification 2023:

The University of Southern California's Annual Security and Fire Safety Reports (ASR) for the past three years are available online at: <https://dps.usc.edu/alerts/annual-report/>.

The Annual Security and Fire Safety Report includes Clery Act crime and fire statistics for the preceding three years for locations owned and or controlled by USC, the required policy disclosure statements and other important safety related information. A paper copy of the ASR is available on request made to Department of Public Safety Records by calling [\(213\) 740-6000](#), by email to DPSRecords@dps.usc.edu or in person at DPS at 3667 South McClintock Avenue, Los Angeles, California 90089.

EXHIBIT B



University of Southern California

University Park, Los Angeles, California 90089

General information: (213) 740-2311

Website: www.usc.edu/

Type:

4-year, Private not-for-profit

Bachelor's degree

Postbaccalaureate certificate

Master's degree

Post-master's certificate

Doctor's degree - research/scholarship

Doctor's degree - professional practice

Doctor's degree - other

Campus setting: City: Large

Campus housing: Yes

Student population: 48,945 (20,699 undergraduate)

Student-to-faculty ratio: 9 to 1



[View on Google Maps](#)

IPEDS ID: 123961
OPE ID: 00132800

GENERAL INFORMATION

TUITION, FEES, AND ESTIMATED STUDENT EXPENSES

ESTIMATED EXPENSES FOR FULL-TIME BEGINNING UNDERGRADUATE STUDENTS

- Beginning students are those who are entering postsecondary education for the first time.

ESTIMATED EXPENSES FOR ACADEMIC YEAR	2020-2021	2021-2022	2022-2023	2023-2024	% CHANGE 2022-2023 TO 2023-2024
Tuition and fees	\$60,275	\$61,503	\$64,726	\$68,237	5.4%
Books and supplies	\$1,200	\$1,200	\$1,200	\$1,200	0.0%
Living arrangement					
On Campus					
Food and Housing	\$16,398	\$16,732	\$17,436	\$19,198	10.1%
Other expenses	\$2,278	\$2,224	\$1,702	\$1,818	6.8%
Off Campus					
Food and Housing	\$16,398	\$16,732	\$17,436	\$19,198	10.1%
Other expenses	\$2,278	\$2,224	\$1,702	\$1,818	6.8%
Off Campus with Family					
Other expenses	\$3,628	\$3,556	\$3,650	\$3,690	1.1%
TOTAL EXPENSES					
	2020-2021	2021-2022	2022-2023	2023-2024	% CHANGE 2022-2023 TO 2023-2024
On Campus	\$80,151	\$81,659	\$85,064	\$90,453	6.3%
Off Campus	\$80,151	\$81,659	\$85,064	\$90,453	6.3%
Off Campus with Family	\$65,103	\$66,259	\$69,576	\$73,127	5.1%

MULTIYEAR TUITION CALCULATOR

Estimate the total tuition and fee costs over the duration of a typical program.

AVERAGE GRADUATE STUDENT TUITION AND FEES FOR ACADEMIC YEAR

2023-2024

Tuition	\$66,640
Fees	\$1,488

ALTERNATIVE TUITION PLANS AND PROMISE PROGRAM

TYPE OF PLAN	OFFERED
Tuition guarantee plan	
Prepaid tuition plan	X
Tuition payment plan	X
Other alternative tuition plan	
Participates in a Promise program	

FINANCIAL AID

NET PRICE

ENROLLMENT

ADMISSIONS

RETENTION AND GRADUATION RATES

OUTCOME MEASURES

PROGRAMS/MAJORS

SERVICEMEMBERS AND VETERANS

Exhibit B – Page 13

[+ VARSITY ATHLETIC TEAMS](#)[+ ACCREDITATION](#)[+ CAMPUS SECURITY AND SAFETY](#)[+ COHORT DEFAULT RATES](#)English | [Español](#) | [About](#) | [Search Plug-in](#)[College Navigator Home](#) | [College Costs](#) | [Prepare](#) | [Financial Aid](#) | [Careers](#)

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Education**[Additional Resources](#)[ERIC](#)[Sitemap](#)[Organizational Chart](#)

EXHIBIT C

Form **990**Department of the Treasury
Internal Revenue Service**Return of Organization Exempt From Income Tax**

Under section 501(c), 527, or 4947(a)(1) of the Internal Revenue Code (except private foundations)
 Do not enter social security numbers on this form as it may be made public.
 Go to www.irs.gov/Form990 for instructions and the latest information.

OMB No. 1545-0047

2022Open to Public
Inspection**A For the 2022 calendar year, or tax year beginning** _____ and ending _____

B Check if applicable:	C Name of organization			D Employer identification number
<input checked="" type="checkbox"/> Address change	TIDES FOUNDATION			51-0198509
Name change	Doing business as			
Initial return				
Final return/terminated				
<input checked="" type="checkbox"/> Amended return				
Application pending				
F Name and address of principal officer: JANIECE EVANS-PAGE SAME AS C ABOVE				
I Tax-exempt status: <input checked="" type="checkbox"/> 501(c)(3) 501(c) () (insert no.) 4947(a)(1) or				527
J Website: WWW.TIDES.ORG				
K Form of organization: <input checked="" type="checkbox"/> Corporation Trust Association Other				L Year of formation: 1976 M State of legal domicile: CA

Part I Summary

Activities & Governance	1 Briefly describe the organization's mission or most significant activities: GRANTMAKING THROUGH FUNDS TO ACCELERATE THE PACE OF SOCIAL CHANGE.		
	2 Check this box if the organization discontinued its operations or disposed of more than 25% of its net assets.		
	3 Number of voting members of the governing body (Part VI, line 1a)	3 8	
	4 Number of independent voting members of the governing body (Part VI, line 1b)	4 8	
	5 Total number of individuals employed in calendar year 2022 (Part V, line 2a)	5 0	
	6 Total number of volunteers (estimate if necessary)	6 287	
	7a Total unrelated business revenue from Part VIII, column (C), line 12	7a 23,516.	
Revenue	b Net unrelated business taxable income from Form 990-T, Part I, line 11	7b 66,250.	
	8 Contributions and grants (Part VIII, line 1h)	Prior Year	Current Year
	9 Program service revenue (Part VIII, line 2g)	820,781,802.	573,714,006.
	10 Investment income (Part VIII, column (A), lines 3, 4, and 7d)	2,108,308.	1,975,737.
	11 Other revenue (Part VIII, column (A), lines 5, 6d, 8c, 9c, 10c, and 11e)	40,591,399.	5,005,685.
Expenses	12 Total revenue - add lines 8 through 11 (must equal Part VIII, column (A), line 12)	0.	0.
	13 Grants and similar amounts paid (Part IX, column (A), lines 1-3)	863,481,509.	580,695,428.
	14 Benefits paid to or for members (Part IX, column (A), line 4)	600,595,638.	666,795,331.
	15 Salaries, other compensation, employee benefits (Part IX, column (A), lines 5-10)	0.	0.
	16a Professional fundraising fees (Part IX, column (A), line 11e)	0.	0.
	b Total fundraising expenses (Part IX, column (D), line 25)	1,820,067.	
	17 Other expenses (Part IX, column (A), lines 11a-11d, 11f-24e)	14,155,079.	18,728,311.
Net Assets or Fund Balances	18 Total expenses. Add lines 13-17 (must equal Part IX, column (A), line 25)	614,750,717.	685,523,642.
	19 Revenue less expenses. Subtract line 18 from line 12	248,730,792.	-104,828,214.
	20 Total assets (Part X, line 16)	Beginning of Current Year	End of Year
	21 Total liabilities (Part X, line 26)	1232210451.	978,547,541.
22 Net assets or fund balances. Subtract line 21 from line 20		86,254,978.	84,337,478.
		1145955473.	894,210,063.

Part II Signature Block

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

Sign Here	Signature of officer JAMES LUM, TREASURER/CFO			Date
	Type or print name and title			
Paid Preparer	Print/Type preparer's name JOCELYNE MILLER	Preparer's sign 	Date 2/13/24	Check if self-employed <input type="checkbox"/> PTIN P00634378
Use Only	Firm's name DELOITTE TAX LLP			Firm's EIN 86-1065772
	Firm's address 12830 EL CAMINO REAL, SUITE 600 SAN DIEGO, CA 92130			Phone no. (619) 232-6500

May the IRS discuss this return with the preparer shown above? See instructions Yes No

Form **8868**

(Rev. January 2022)

Department of the Treasury
Internal Revenue Service**Application for Automatic Extension of Time To File an
Exempt Organization Return**

OMB No. 1545-0047

► File a separate application for each return.

► Go to www.irs.gov/Form8868 for the latest information.

Electronic filing (e-file). You can electronically file Form 8868 to request a 6-month automatic extension of time to file any of the forms listed below with the exception of Form 8870, Information Return for Transfers Associated With Certain Personal Benefit Contracts, for which an extension request must be sent to the IRS in paper format (see instructions). For more details on the electronic filing of this form, visit www.irs.gov/e-file-providers/e-file-for-charities-and-non-profits.

Automatic 6-Month Extension of Time. Only submit original (no copies needed).

All corporations required to file an income tax return other than Form 990-T (including 1120-C filers), partnerships, REMICs, and trusts must use Form 7004 to request an extension of time to file income tax returns.

Type or print	Name of exempt organization or other filer, see instructions. TIDES FOUNDATION	Taxpayer identification number (TIN) 51-0198509
File by the due date for filing your return. See instructions.	Number, street, and room or suite no. If a P.O. box, see instructions. 1012 TORNEY AVENUE	
	City, town or post office, state, and ZIP code. For a foreign address, see instructions. SAN FRANCISCO, CA 94129	

Enter the Return Code for the return that this application is for (file a separate application for each return) **0 1**

Application Is For	Return Code	Application Is For	Return Code
Form 990 or Form 990-EZ	01	Form 1041-A	08
Form 4720 (individual)	03	Form 4720 (other than individual)	09
Form 990-PF	04	Form 5227	10
Form 990-T (sec. 401(a) or 408(a) trust)	05	Form 6069	11
Form 990-T (trust other than above)	06	Form 8870	12
Form 990-T (corporation)	07		

HOLDEN LEE

- The books are in the care of ► **1012 TORNEY AVENUE - SAN FRANCISCO, CA 94129**

Telephone No. ► **(415) 561-6400**

Fax No. ► _____

- If the organization does not have an office or place of business in the United States, check this box _____ ►
- If this is for a Group Return, enter the organization's four digit Group Exemption Number (GEN) _____. If this is for the whole group, check this box ► . If it is for part of the group, check this box ► and attach a list with the names and TINs of all members the extension is for.

1 I request an automatic 6-month extension of time until **NOVEMBER 15, 2023**, to file the exempt organization return for the organization named above. The extension is for the organization's return for:

► calendar year **2022** or► tax year beginning _____, and ending _____.

2 If the tax year entered in line 1 is for less than 12 months, check reason: Initial return Final return
Change in accounting period

3a If this application is for Forms 990-PF, 990-T, 4720, or 6069, enter the tentative tax, less any nonrefundable credits. See instructions.	3a	\$ 0.
b If this application is for Forms 990-PF, 990-T, 4720, or 6069, enter any refundable credits and estimated tax payments made. Include any prior year overpayment allowed as a credit.	3b	\$ 0.
c Balance due. Subtract line 3b from line 3a. Include your payment with this form, if required, by using EFTPS (Electronic Federal Tax Payment System). See instructions.	3c	\$ 0.

Caution: If you are going to make an electronic funds withdrawal (direct debit) with this Form 8868, see Form 8453-TE and Form 8879-TE for payment instructions.

LHA For Privacy Act and Paperwork Reduction Act Notice, see instructions.

Form **8868** (Rev. 1-2022)

Schedule I (Form 990) Part II Continuation of Grants and Other Assistance to Domestic Organizations and Domestic Governments (Schedule I (Form 990), Part II.)							
(a) Name and address of organization or government	(b) EIN	(c) IRC section if applicable	(d) Amount of cash grant	(e) Amount of noncash assistance	(f) Method of valuation (book, FMV, appraisal, other)	(g) Description of non-cash assistance	(h) Purpose of grant or assistance
UNIVERSITY OF NEW MEXICO FOUNDATION INCORPORATED - 700 LOMAS BOULEVARD NE - ALBUQUERQUE, NM 87102	85-0275408	501(C)(3)	100,000.	0.			HEALTHY INDIVIDUALS AND COMMUNITIES
UNIVERSITY OF NOTRE DAME DU LAC 400 MAIN BUILDING NOTRE DAME, IN 46556	35-0868188	501(C)(3)	25,000.	0.			QUALITY EDUCATION
UNIVERSITY OF OKLAHOMA FOUNDATION INC - 100 W. TIMBERDELL ROAD - NORMAN, OK 73019	73-6091755	501(C)(3)	250,000.	0.			QUALITY EDUCATION
UNIVERSITY OF PORTLAND 5000 N. WILLAMETTE BOULEVARD PORTLAND, OR 97203	93-0401259	501(C)(3)	12,000.	0.			QUALITY EDUCATION
UNIVERSITY OF SOUTH CAROLINA EDUCATIONAL FOUNDATION - 1600 HAMPTON ST, STE 612 - COLUMBIA, SC 29208	57-6017985	501(C)(3)	15,000.	0.			EQUITY, HUMAN RIGHTS, AND ECONOMIC EMPOWERMENT
UNIVERSITY OF SOUTHERN CALIFORNIA 1150 SOUTH OLIVE STREET, 25TH FLOOR LOS ANGELES, CA 90015	95-1642394	501(C)(3)	250,000.	0.			QUALITY EDUCATION
UNIVERSITY OF TEXAS AT AUSTIN PO BOX 7159 AUSTIN, TX 78713	27-2576059	GOVERNMENT ENTIT	930,766.	0.			QUALITY EDUCATION
UNIVERSITY OF WASHINGTON 4333 BROOKLYN AVENUE NE, BOX 359472 SEATTLE, WA 98195	91-6001537	GOVERNMENT ENTIT	320,000.	0.			SUSTAINABLE ENVIRONMENT
UNIVERSITY OF WASHINGTON FOUNDATION - BOX 359505 - SEATTLE, WA 98195	94-3079432	501(C)(3)	15,000.	0.			QUALITY EDUCATION

Schedule I (Form 990)

EXHIBIT D

AWARDED GRANTS

The Open Society Foundations work to build vibrant and inclusive democracies whose governments are accountable to their citizens. The vast majority of the grants made by Open Society are to organizations, but we also award a limited number of grants to individuals through fellowships offered across a number of different programs.

Grant and fellowship opportunities

About this database

University of Southern California

► **University of Southern California** 2022 \$50,000

► **University of Southern California** 2022 \$600,000

► **University of Southern California** 2021 \$230,000

► **University of Southern California** 2021 \$150,000

► **University of Southern California** 2020 \$200,000

► **University of Southern California** 2020 \$200,000

► **University of Southern California** 2017 \$240,765

► **University of Southern California** 2016 \$10,000

► **University of Southern California** 2016 \$200,000

EXHIBIT E

WHO WE ARE

The Open Society Foundations, founded by George Soros, are the world's largest private funder of independent groups working for justice, democratic governance, and human rights.

[George Soros](#)

[Our History](#)

HISTORY

George Soros, the founder of the Open Society Foundations, began his philanthropic work in 1979, funding scholarships for Black African university students in South Africa and for East European dissidents to study in the West. Today, his Foundations fund groups and projects in more than 120 countries.

Starting to Build a More Open World
1979

Encouraging Dissent Behind the Iron Curtain
1984

**Supporting Democracy in China
1986**

**Fostering Open Societies in the Former Soviet Bloc
1989**

**Central European University Opens Its Doors
1991**

[Explore the full timeline](#)

MISSION

The Open Society Foundations champion the search for bold, democratic solutions to our urgent, common challenges that advance justice, equity, and human dignity.

We do this by supporting a wide array of independent voices and organizations around the world that provide a creative and dynamic link between the governing and the governed.

Our approach seeks to counter the narrow pursuit of political self-interest and short-term opportunism—in pursuit of a sustainable future for people and planet that leaves no one behind.

LEADERSHIP



George Soros

Founder

George Soros launched his philanthropic work in South Africa in 1979. Since then he has given over \$32 billion to fund the Open Society Foundations, which work in over 120 countries around the world.



Alexander Soros

Chair

Alexander Soros is chair of the Board of Directors.

[View more leadership](#)

OFFICES

The Open Society Foundations' staff are based in offices across our six regions: Africa, Asia Pacific, Europe and Central Asia, Latin America and the Caribbean, the Middle East and North Africa, and the United States.

[View our offices](#)

BOARD OF DIRECTORS

Our Board of Directors helps guide our staff, partners, and grantees as they work throughout the world to promote justice, equity, and expression.

[View our board of directors](#)

EXHIBIT F

OUR GRANTS/

University of Southern California

Dollars Granted

\$700,000

Term

09.01.2020 - 01.01.2023

Focus Area

Health

Description:

in support of piloting and evaluating smart, COVID-19 testing protocols to help communities and institutions reopen and stay open

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EXHIBIT G

University of Southern California

 Top 60 in Jewish population

 Hillel serves this location

 Kosher dining available

 Hillel Rabbi/Senior Jewish Educator

 Hillel mental health/wellness staff



Explore University of Southern California Hillel Foundation

USC Hillel is the Center of Jewish Life at USC, engaging over 1,500 unique students annually. We are student centered, empowering a dynamic team of student leaders who curate meaningful Jewish experiences for the USC community. USC Hillel develops leaders and inspires Jewish Trojans to make an enduring commitment to Jewish life. We offer a welcoming, inclusive, and pluralistic environment, a nurturing space to build strong Jewish community, and an emphasis on peer-to-peer relationship building among an actively engaged student base. USC Hillel strives to create a balanced offering of programming across our core pillars of Leadership Development, Building Community, Ritual and Spiritual Life, Social Justice, Israel Engagement and Education, and Holistic Wellness.

This Hillel serves: University of Southern California; Hebrew Union College, Los Angeles; USC Health Sciences

Undergraduate Enrollment ?

2,000 Jewish Students (9.8%*)

20,505 Students

*Percent of population

Graduate Enrollment ?

2,000 Jewish Students (7.1%*)

28,246 Students

*Percent of population

Jewish Experience

Served by Hillel

Yes

Religious Services Available

Yes

Hillel Rabbi/Senior Jewish Educator

Yes

Kosher Food Available

Yes

Birthright Israel Participation

Yes

Alt Break Participation 

No

Jewish Studies Offered

Yes

Jewish Studies Major or Minor

Minor, Major

Study Abroad in Israel

**University sponsored program, University approved programs, Accepts credit
for Israel study abroad**

Israel Fellow

No

JLIC Educator 

No

Hillel Mental Health/Wellness Staff

Yes

Campus Climate for Jewish Students

Hillel CCI Antisemitism Training Participant 

No

Open Title VI Investigation  

Yes

Anti-Israel Student Government or BDS Resolution 

None

Anti-Israel Encampment, Spring 2024

Yes

Kosher Dining

USC offers a limited meal plan for weeknight dinners at no extra charge in the dining hall. Hillel frequently serves dinner at weekday programming (and every week for Shabbat). Nearby grocery stores (within walking distance) stock kosher products.

Options: University meal plan-no extra cost; Kosher food available nearby

Religious Services

USC Hillel offers Shabbat experiences each week, including student-led services and themed kosher dinners. We also offer a "Shabbat in a Box" option, which empowers

students to host Shabbat dinners and other celebrations in their own residences. USC Hillel welcomes all students to celebrate Jewish holidays with us including the High Holy Days, Hanukkah, Passover, and more. Services and meals are always free for students.

Frequency: Friday night only

Additional Campus Information

Visit [University Website](#) ↗

Private/Public

Private

Acceptance Rate

11%

U.S. Region

Pacific

Commuter/Residential

Residential

Tuition In-State

\$66,640

Tuition Out-of-State

\$66,640

Out-of-State/Int'l

48% / 13%

Greek Life

Yes

Related News

ISRAEL PROUD TO BE JEWISH

Students Lead on Israel

MARCH 8, 2023

My parents were not yet my age when they were forced to leave their homes in Iran and start a new life in Los Angeles. Like so many other courageous Jewish refugees, they did not hide their identities and love for Israel in the United States. Instead, they engaged in an act of cultural resistance: they invested tenfold in strengthening their own children's Jewish and Zionist identities, and instilled in me pride in who I am.



Trips & Experiences



BIRTHRIGHT ISRAEL

University of Southern California

WINTER 2024

Events

Freshfest

MON. AUG. 19 — TUE. AUG. 20

FreshFest is a two-day retreat at Camp Bob Waldorf for incoming Jewish Trojans to meet fellow USC students, get tips from upperclassmen about campus life, and get a head start at USC. Think of it [...]



The Hillel College Guide aims to provide you with a snapshot of each local Hillel's makeup and offerings. We recognize that there may be more information you need in order to better understand the campus reality, particularly around issues of diversity, equity, inclusion, and accessibility. If you would like additional information about a given campus' offerings or action steps in those areas, please reach out to us at dei@hillel.org.

COMPARE SCHOOLS

Compare colleges that you're interested in by using our college comparison tool.

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CONTACT THIS HILLEL

We would love to hear from you! Reach out about questions, scheduling a tour, and more.

[Contact this Hillel](#)

SOCIAL MEDIA



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Established in 1923, Hillel International is the world's largest and most inclusive Jewish campus organization, serving 160,000 college students each year.

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